

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEBORAH D. PETERSON,
Personal Representative of the Estate of James
C. Knipple (Dec.) *et al.*,

Case No.: 1:10-cv-04518-KBF

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN, BANK
MARKAZI a/k/a CENTRAL BANK OF
IRAN, BANCA UBAE SpA, CITIBANK,
N.A., and CLEARSTREAM BANKING,
S.A.,

Defendants.

AND RELATED ACTIONS

DECLARATION OF JAIME SNEIDER, ESQ.

I, Jaime Sneider, declare as follows:

1. I am a member of the law firm of Boies, Schiller & Flexner LLP, counsel for Proposed Intervenors, the Estate of Daniel Wultz, Sheryl Wultz, Yekutiel “Tuly” Wultz, and Amanda Wultz (collectively, the “Wultzes”). I submit this declaration in support of the Wultzes’ Motion to Intervene.

2. The Wultzes hold a judgment against the Islamic Republic of Iran (“Iran”), Iranian Ministry of Information and Security (collectively, “Iranian Defendants”), Syrian Arab Republic (“Syria”), Syrian Ministry of Defense, Syrian Military Intelligence, and Syrian Air

Force Intelligence Directorate (collectively, “Syrian Defendants”) entered by the United States District Court for the District of Columbia (“DC District Court”) in *Wultz v. The Islamic Republic of Iran, et al.*, Case No. 1:08-cv-01460-RCL. (“Judgment”) pursuant to 28 U.S.C. § 1605(a)(7). The Judgment awarded the Wultzes \$32,068,634 in compensatory damages and \$300,000,000 in punitive damages, for a total award of \$332,068,634. The Defendants are jointly and severally liable for all damages. As of the date of this Declaration, the Judgment is unsatisfied.

3. Attached hereto are true and correct copies of the following documents:

- Exhibit 1: *Memorandum and Opinion, Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: Case No. 1:08-cv-01460-RCL (D. D.C. May 14, 2012).
- Exhibit 2: *Order and Judgment, Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: Case No. 1:08-cv-01460-RCL (D. D.C. May 14, 2012).
- Exhibit 3: *Amended Judgment, Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: Case No. 1:08-cv-01460-RCL (D. D.C. June 4, 2012).
- Exhibit 4: *Certified Copy of Order* (granting the Wultzes motion for authorization to enforce the Judgment pursuant to 28 U.S.C. § 1610(c)), *Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: Case No. 1:08-cv-01460-RCL (D. D.C. January 16, 2013).
- Exhibit 5: *Clerk’s Certification of a Judgment to Be Registered in Another District, Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: Case No. 1:08-cv-01460-RCL (D. D.C. February 8, 2013) and Registered in the Southern District of New York on February 19, 2013, *Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: 13-mc-00055-P1 (SD NY February 19, 2013).
- Exhibit 6: *Recorded Judgment*, New York County Clerk’s Office, February 22, 2013.

Exhibit 7: *Writ of Execution, Sheryl Wultz, et al. v. The Islamic Republic of Iran, et al.*, Case No.: 13-mc-00055-P1 (SD NY February 21, 2013).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 22, 2013

/s/ Jaime Sneider

JAIME SNEIDER